Case 1:13-md-02419-RWZ Document 996-4 Filed 03/10/14 Page 1 of 2 Exhibit C

Beth McCullough

Ben Gastel From:

Sent: Thursday, January 09, 2014 3:02 PM

To: Kimberly A. Dougherty

Cc: Greer, Marcy; C.J. Gideon; Chris Tardio; Daniel Clayton; Daniel M. Rabinovitz; Edgar

> Taylor, III; Elizabeth J. Cabraser (ecabraser@lchb.com); Frederick H. Fern; George Nolan; Gerard Stranch; J. Kyle Roby; Jason Denton; John O. Belcher; Joseph P. Thomas; Kristin Johnson Parker; Kurt W. Maier; Larry Lamont Crain; Marc Lipton; Mark Chalos; Mark Zamora; Matthew P. Moriarty; Melinda L. Thompson; Nathan Hunt; Nicki Samson; Patrick Fennell; Paul J. Krog; Randall Kinnard; Rebecca Blair; Richard A. Dean; Robert H. Gaynor; Ryan A. Ciporkin; Thomas Sobol; Thomas W. Coffey; William Daniel Leader, Jr.; William Hance Lassier, Jr.; Fredric Ellis; Puig, Yvonne K.; Sarah Kelly (SKelly@nutter.com);

'lhollabaugh@babc.com' (lhollabaugh@babc.com); Hoffman, Eric

Re: NECC: further meet and confer re discovery Subject:

All,

Given we have not heard anything on the proposed protocols we plan to submit them for entry today. Please provide any objection immediately.

Thank You,

Ben

On Jan 6, 2014, at 2:40 PM, "Kimberly A. Dougherty" < KDougherty@myadvocates.com > wrote:

I have heard from some of you that tomorrow at 11am EST works and heard no objections. Please add parties who you think may be interested in participating on this call. Please dial:

866-415-4341

Code: 389-954-5863

Thank you and looking forward to talking with you all tomorrow. If there are redlines to the ESI and Deposition Protocols, please send them by the COB today so that we have a chance to review before the call tomorrow. Thank you.

Best, Kim

Kim Dougherty, Esquire Janet, Jenner & Suggs, LLC 31 St. James Avenue Suite 365 Boston, MA 02116 (617) 933-1265 kdougherty@myadvocates.com www.myadvocates.com

*** PLEASE NOTE OUR NEW ADDRESS

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Exhibit C

From: Kimberly A. Dougherty

Sent: Thursday, January 02, 2014 11:09 PM

To: Greer, Marcy; Ben Gastel; C.J. Gideon; Chris Tardio; Daniel Clayton; Daniel M. Rabinovitz; Edgar Taylor, III; Elizabeth J. Cabraser (ecabraser@lchb.com); Frederick H. Fern; George Nolan; Gerard Stranch; J. Kyle Roby; Jason Denton; John O. Belcher; Joseph P. Thomas; Kristin Johnson Parker; Kurt W. Maier; Larry Lamont Crain; Marc Lipton; Mark Chalos; Mark Zamora; Matthew P. Moriarty; Melinda L. Thompson; Nathan Hunt; Nicki Samson; Patrick Fennell; Paul J. Krog; Randall Kinnard; Rebecca Blair; Richard A. Dean; Robert H. Gaynor; Ryan A. Ciporkin; Thomas Sobol; Thomas W. Coffey; William Daniel Leader, Jr.; William Hance Lassier, Jr.; Fredric Ellis

Cc: Puig, Yvonne K.; Sarah Kelly (<u>SKelly@nutter.com</u>); '<u>lhollabaugh@babc.com</u>' (<u>lhollabaugh@babc.com</u>);

Hoffman, Eric

Subject: NECC: further meet and confer re discovery

All,

Per the Court's order requiring the parties to further meet and confer on discovery related matters transferred to Magistrate Boal, members of the PSC propose a call in advance of next week's hearing to take place on <u>1/7/14 at 11 EST</u>. Please suggest an alternative time if this does not work for the majority. Thank you.

As a reminder, the PSC awaits comments and edits on the proposed Deposition and ESI Protocols.

Please add anyone who may have been inadvertently left off of this email. Thank you.

Best, Kim

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